

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	NO. 20-CR-40037-TSH
	)	
VINCENT EOVIACIOUS	)	

**MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE**

Defendant, Vincent Eovacious, by his attorney, seeks to amend or remove additional condition of release 8(t)(ii), which orders that he is to remain on home detention and 8(j), which orders that he is to maintain his residence in Worcester, MA.

In support of this request, the Defendant states that over the summer his family home was damaged in a significant fire. He and his parents have been displaced by that fire and were living first at a hotel, and presently at a long-term, but temporary, apartment. In the past week Mr. Eovacious' family was again required to move, this time to a location outside of Worcester. Mr. Eovacious has notified the Probation Department of his new address, this has been confirmed through his father the 3<sup>rd</sup> Party Custodian, and he will continue to be monitored via SmartLink.

Further, Mr. Eovacious' father has begun repairs on their home in Worcester. We ask the Court for permission for Mr. Eovacious to work with his father at the home on weekends. Defense Counsel has conferred with the Government who assents to this request so long as Mr. Eovacious is accompanied by his father on those trips.

Respectfully submitted,

VINCENT EOVIACIOUS

By his Attorney

Respectfully submitted,

/s/ Jessica Thrall

Jessica Thrall, B.B.O.: 670412

Assistant Federal Public Defender

Federal Defender Office

51 Sleeper Street, 5<sup>th</sup> Floor

Boston, MA 02210

Tel: 617-223-8061

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 1, 2021.

/s/ Jessica Thrall

Jessica Thrall